

HAT:nab

AO 91 (Rev. 11/11) Criminal Complaint

2022R00490

UNITED STATES DISTRICT COURT  
for the  
District of Minnesota

UNITED STATES OF AMERICA

v.

IBRAHIM GHASSAN SLEYMAN

**FILED UNDER SEAL PURSUANT  
TO 18 U.S.C. § 3509(d)(2) AND  
LOCAL RULE 49.1(c)(1)(G)**

Case No. 22-MJ-890 (TNL)

**CRIMINAL COMPLAINT**

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

COUNT 1 – Production of Child Pornography

From at least on or about October 28, 2020, and continuing through on or about October 29, 2020, in the District of Minnesota and elsewhere, IBRAHIM GHASSAN SLEYMAN attempted to and did employ, use, persuade, induce, entice, and coerce Minor Victim 1, who was then approximately 9 years old, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, transported in and affecting interstate and foreign commerce, and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of 18 U.S.C. §§ 2251(a) and (e).

COUNT 2 – Receipt of Child Pornography

On or about July 21, 2022, in the District of Minnesota and elsewhere, IBRAHIM GHASSAN SLEYMAN attempted to and did knowingly receive a visual depiction, to wit, a live video call in which Minor Victim 3 was depicted masturbating. The visual depictions of the live video call were received using a means or facility of interstate commerce by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct, all in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT 3 – Child Enticement Using a Facility of Interstate Commerce

From on or about July, 2021 through on or about July 13, 2022, in the District of Minnesota and elsewhere, IBRAHIM GHASSAN SLEYMAN, did use the mail or any facility or means of interstate or foreign commerce to knowingly persuade, induce, entice, and coerce Minor Victim 2 to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, to wit, Criminal Sexual Conduct in the first, second, and third degrees, in violation of Minnesota laws, and attempted to do so, all in violation of 18 U.S.C. § 2422(b).

COUNT 4 – Transfer of Obscene Material to a Minor

On or about April 19, 2021, using the mail or any facility or means of interstate or foreign commerce, knowingly transferred obscene matter to another individual who had not attained the age of 16 years, knowing that such other individual had not attained the age of 16 years, and attempted do so. The obscene matter is a video file identified as b~EiQSFURjMTU4d2J5VVVIYVFiRHBvTHpKQRoAGgAyAQNIAlAEYAE~v4.mp4. The file is a video approximately 22 seconds in duration. It depicts an adult male masturbating to ejaculation, all in violation of 18 U.S.C. § 1470; and


COUNT 5 – Identity Theft

From at least on or about October 28, 2020, and continuing through at least on or about September 13, 2022, in the District of Minnesota and elsewhere, IBRAHIM GHASSAN SLEYMAN knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, to wit victim A.W., with the intent to commit, and to aid or abet, and in connection with unlawful activity that constituted a violation of federal law, to wit the offense alleged in Count 1, all in violation of 18 U.S.C. §§ 1028(a)(7) and (b)(1)(D).

I further state that I am a Federal Bureau of Investigation Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

  
Complainant's Signature

SUBSCRIBED and SWORN before me  
by reliable electronic means (Zoom and email)  
pursuant to Fed. R. Crim. P. 41(d)(3).

Matthew Vogel, Special Agent  
Federal Bureau of Investigation  
Printed name and title

Date: October 28, 2022

  
Judge's Signature

City and State: Minneapolis, MN

The Honorable Tony N. Leung  
United States Magistrate Judge  
Printed Name and Title

October 28, 2022